

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Artero Hollingsworth)	
)	
Plaintiff,)	
)	
v.)	No. 15-cv-1595
)	
ILLINOIS DEPARTMENT OF)	Hon. Judge Sara L. Ellis
CORRECTIONS, <i>et al.</i>)	
)	
Defendants)	

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Plaintiff Artero Hollingsworth (“Plaintiff”) and Defendants Wexford Health Sources (“Wexford”) and Ghaliah Obaisi, as Independent Executor of the Estate of Saleh Obaisi (the “Independent Executor”), by their counsel, hereby move this Court for entry of an Agreed Confidentiality Order, which is concurrently submitted to the Court’s inbox for proposed orders, to preserve the confidentiality of certain materials to be produced in discovery. In support of this motion, the parties state as follows:

1. The parties have already produced a number of documents and records primarily consisting of Plaintiff’s medical records and related documents. These records have already been the subject of deposition testimony in multiple depositions. Further, Plaintiff has served Wexford with requests for the production of certain documents primarily relating to confidential and proprietary trade secrets relating to Wexford’s business practices and policies.

2. In order to maintain the confidentiality of the parties’ information, counsel for Plaintiff, Wexford, and the Independent Executor have reviewed and agreed to the Agreed Confidentiality Order submitted separately to the Court.

3. The proposed Agreed Confidentiality Order is based on Form LR 26.2. A redline comparison identifying the differences between the proposed order and Form LR 26.2 has also been submitted to the Court's inbox for proposed orders.

WHEREFORE, Plaintiff, Wexford, and the Independent Executor respectfully request that the Court enter the proposed Agreed Confidentiality Order.

Dated: January 22, 2019

Respectfully submitted,

/s/ Corwin J. Carr
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*Counsel for Wexford and Ghaliah Obaisi as
Independent Executor*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on January 22, 2019, I caused a true and correct copy of the foregoing Joint Motion for Entry of Agreed Confidentiality Order to be filed and served electronically via the Court's CM/ECF system, and submitted the proposed Agreed Confidentiality Order and the corresponding redline via email to the Court's designated inbox for proposed orders.

/s Corwin J. Carr
Corwin J. Carr